

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

-v. - :

JOSE MEDINA, :
a/k/a "Lou," :

Defendant. :

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**DECLARATION IN SUPPORT OF
JUDGMENT OF DEFAULT AND
FORFEITURE OF THE BOND**

11 Cr. 676 (RJS)

Alvin Bragg, pursuant to Title 28, United States Code, Section 1746, hereby declares the following under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Preet Bharara, United States Attorney for the Southern District of New York, and am responsible for the above-captioned case. As such, I am fully familiar with the facts and proceedings therein.

2. This declaration is submitted in support of the Government's motion for an order and a judgment of default of the \$200,000 bond for the defendant JOSE MEDINA (the "defendant"), signed by the defendant and co-signed by BETZANDY GONZALEZ, MARTHA HALL and CLARA CUELLO.

3. The defendant was arrested on July 28, 2011, pursuant to a warrant issued in connection with a complaint charging the defendant with conspiracy to commit various drug trafficking offenses, in violation of 21 U.S.C. Sections 846, 841(b)(1)(A) and 841(b)(1)(B). After the defendant's arrest, the Honorable Henry B. Pitman granted the defendant bail on (among other conditions) a \$200,000 bond, co-signed by three financially responsible persons and secured by \$10,000 in cash. BETZANDY GONZALEZ, MARTHA HALL and CLARA CUELLO co-signed the defendant's bond. A copy of the defendant's bond is attached hereto as Exhibit A.

4. On or about August 8, 2011, a grand jury sitting in the Southern District of New

York returned an indictment charging the defendant with conspiracy to commit various drug trafficking offenses, in violation of 21 U.S.C. Sections 846, 841(b)(1)(A) and 841(b)(1)(B). On February 28, 2012, the defendant pleaded guilty to a Superseding Information that charged him with conspiracy to commit various drug trafficking offenses, in violation of 21 U.S.C. Sections 846, 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C), and using and carrying a firearm in connection with a drug trafficking crime, in violation of 18 U.S.C. Section 924(c)(1)(A)(i).

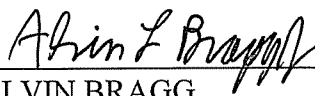
5. On April 27, 2012, the defendant failed to appear for a scheduled court conference and, upon the Government's application, the Court issued a warrant for the defendant's arrest. A copy of the arrest warrant is attached hereto as Exhibit B.

6. A proposed Order of Forfeiture and Judgment is annexed hereto for the Court's consideration as Exhibit C.

WHEREFORE, it is respectfully requested that the Court enter an Order and a Judgment of Forfeiture on the \$200,000 appearance bond for JOSE MEDINA (the "defendant"), signed by the defendant and co-signed by BETZANDY GONZALEZ, MARTHA HALL and CLARA CUELLO, and secured by \$10,000 in cash.

Dated: New York, New York
May 30, 2012

PREET BHARARA
United States Attorney

By: 
ALVIN BRAGG
Assistant United States Attorney
(212) 637-1085